

Jennie Pellegrin

From: Jennie Pellegrin
Sent: Thursday, November 19, 2020 2:10 PM
To: Donecia Banks-Miley
Cc: Allison Faulk; Beth Bloch; Steven Oxenhandler
Subject: RE: Activity in Case 3:20-cv-01372-TAD-KLH Bowman v. Sheriffs Office Ouachita Parish et al Amended Complaint

Thank you for the reply and clarification.

On a separate note, we do not object to your request for additional time to file your opposition to our pending Rule 12(b) motion. I meant to notify you of that in writing in response to a request you previously made but apparently failed to transmit that word to you. I apologize for that.



JENNIE P. PELLEGRIN
ATTORNEY

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Bio

V-Card

From: Donecia Banks-Miley <dbmiley@pwblaw.net>
Sent: Thursday, November 19, 2020 12:42 PM
To: Jennie Pellegrin <jpellegrin@neunerpate.com>
Cc: Allison Faulk <afaulk@neunerpate.com>; Beth Bloch <bbloch@neunerpate.com>; Steven Oxenhandler <soxenhandler@goldweems.com>
Subject: Re: Activity in Case 3:20-cv-01372-TAD-KLH Bowman v. Sheriffs Office Ouachita Parish et al Amended Complaint

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Good afternoon Jennie,

To clarify, the only parties who we intended to dismiss are Ouachita Parish Sheriff's Department agency and Metro Narcotics. All other parties remain. We have added in insurance companies for all other remaining parties and listed their identities as ABC Insurance until all can be ascertained. As they are revealed, we will file for leave to amend once again. This case is unique because of the multiple parties involved and who are

apart of the "SCAT Team", which also means that their insurers must be joined into the suit. Sheriff Jay Russell and Deputy Ginn are still parties to the suit even though OPSD is being dismissed.

Further, Monroe Police Department and the City of Monroe are also still in the suit. I attempted to note this by stating that all aspects of the Original Complaint be restated herein.

"The original complaint as set forth in paragraph 1-50, including unnumbered paragraphs beginning "Wherefore, Petitioner" are restated and re-averred if recited full herein."

I am now requesting a 14-day extension of time respond to your motion to dismiss. Please respond in writing via email as the rules state that I need consent in writing. If you need further clarification, please let me know. 318-512-1417.

From: Jennie Pellegrin <jpellegrin@neunerpate.com>

Sent: Thursday, November 19, 2020 12:20 PM

To: Donecia Banks-Miley <dbmiley@pwblaw.net>

Cc: Allison Faulk <afaulk@neunerpate.com>; Beth Bloch <bbloch@neunerpate.com>; Steven Oxenhandler <soxenhandler@goldweems.com>

Subject: FW: Activity in Case 3:20-cv-01372-TAD-KLH Bowman v. Sheriffs Office Ouachita Parish et al Amended Complaint

Good afternoon, Donecia:

We received your amended complaint and wanted to inquire about who the remaining parties actually are intended to be.

The attached amended seems to identify only DPSC and the Board of Supervisors, as well as many "John Doe" and "ABC Insurance" defendants. Importantly, the complaint states this:

VOLUNTARY DISMISSAL OF ACTIONS AGAINST

22. Plaintiff hereby voluntarily dismisses only Ouachita Parish Sheriff's Office and Metro Narcotics Unit from this entire case.

23. Such dismissal shall be without prejudice, with each side to bear its own costs and fees.

Yet, the amended complaint contains allegations wherein the Sheriff and Deputy Ginn specifically were mentioned, but they do not appear to be listed as parties.

Also confusing is that the original lawsuit referred to the City of Monroe and the Monroe Police Department. Although this amended complaint does not specifically name either of them, the amended complaint does refer to the Monroe Police Department, you identify unknown insurers of both the City of Monroe and the Monroe Police Department and nowhere state that either is being dismissed.

At this point, I don't know who is in and who is out in terms of the parties. Therefore, I am writing in effort to clear up my confusion/uncertainty about this and would welcome any insight you are able to share.

Thanks in advance for your response.

Kindest regards,
Jennie



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Bio

V-Card

From: Reply@lawd.uscourts.gov <Reply@lawd.uscourts.gov>

Sent: Wednesday, November 18, 2020 11:30 AM

To: Clerk@lawd.uscourts.gov

Subject: Activity in Case 3:20-cv-01372-TAD-KLH Bowman v. Sheriffs Office Ouachita Parish et al Amended Complaint

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U.S. District Court

Western District of Louisiana

Notice of Electronic Filing

The following transaction was entered by Banks-Miley, Donecia on 11/18/2020 at 11:29 AM CST and filed on 11/18/2020

Case Name: Bowman v. Sheriffs Office Ouachita Parish et al

Case Number: [3:20-cv-01372-TAD-KLH](https://ecf.wdl.uscourts.gov/caselist/3:20-cv-01372-TAD-KLH)

Filer: Aaron Larry Bowman

Document Number: [19](#)

Docket Text:

AMENDED COMPLAINT Aaron Larry Bowman against Donovan Ginn, Louisiana State Police Dept, Metro Narcotics Unit, City of Monroe, Police Dept City of Monroe, Sheriffs Office

Ouachita Parish, LA Dept of Public Safety & Corrections, Jay Russell, Police Dept University of Louisiana Monroe, University of Louisiana System Board of Supervisors with Jury Demand filed by Aaron Larry Bowman. (Attachments: # (1) Notice of manual attachment Jump Drive with video footage (Exhibit B))(aty,Banks-Miley, Donecia)

3:20-cv-01372-TAD-KLH Notice has been electronically mailed to:

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3:20-cv-01372-TAD-KLH Notice will not be electronically mailed to:

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Original filename:n/a

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Document description:Notice of manual attachment Jump Drive with video footage (Exhibit B)

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[STAMP dcecfStamp_ID=1045083339 [Date=11/18/2020] [FileNumber=5331675-1] [6b6e49f65547a28de700d9f2bc0ff391c42eadd2a144e8b2d887c133f0897fa3e75706754d58beb5e1205fe560095f6b518e8f214f3357a9a03a9e236e5e81c1]]

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